

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, *et al.*,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

§
§
§
§
§
§
§
§
§
§
§

Civil Action No. 4:20-cv-00957-SDJ

**DEFENDANT GOOGLE LLC’S NOTICE OF SUBMISSION
TO THE SPECIAL MASTER REGARDING PRODUCTION OF CERTAIN
DOCUMENTS AND DATA**

Pursuant to the Order Appointing Special Master (Dkt. 213) directing that papers submitted to the Special Master must be filed with the Court, Defendant Google LLC hereby provides notice of a submission to the Special Master answering a question from the August 12, 2024 hearing on Meta Platforms, Inc.’s (“Meta”) Motion for a Protective Order (Dkt. 521), regarding production of certain Meta documents and data. Google’s submission to the Special Master is attached hereto as Exhibit A.

Dated: August 14, 2024

Respectfully submitted,

GIBBS & BRUNS LLP

/s/ Kathy D. Patrick

Kathy D. Patrick
State Bar No. 15581400
KPatrick@gibbsbruns.com
Robin C. Gibbs
Texas Bar No. 07853000
RGibbs@gibbsbruns.com
Ayesha Najam
Texas Bar No. 24046507
ANajam@gibbsbruns.com
Charles M. Rosson
Texas Bar No. 24074985
CRosson@gibbsbruns.com
Caitlin A. Halpern
Texas Bar No. 24116474
CHalpern@gibbsbruns.com
Ann T. Lebeck
Texas Bar No. 24055840
ALebeck@gibbsbruns.com
Michael R. Davis
Texas Bar No. 24109793
MDavis@gibbsbruns.com
Michael D. Doman
Texas Bar No. 24131182
MDoman@gibbsbruns.com
1100 Louisiana, Suite 5300
Houston, Texas 77002
Tel.: (713) 650-8805
Fax: (713) 750-0903

Eric Mahr (*pro hac vice*)
FRESHFIELDS BRUCKHAUS DERINGER US LLP
700 13th Street, NW
10th Floor
Washington, DC 20005
Telephone: (202) 777-4545
Email: eric.mahr@freshfields.com

ATTORNEYS FOR DEFENDANT GOOGLE LLC

CERTIFICATE OF SERVICE

I certify that on August 14, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ Kathy D. Patrick
Kathy D. Patrick